

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Clerk's Office  
Filed Date: Received on 5/1/2025 DMP  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
BROOKLYN OFFICE

-----X  
MIGUEL VAAMONDES BARRIOS  
GLORIA BROWNING VAAMONDES BARRIOS,  
  
Petitioners,

Civil Action No.  
25-cv-1759

V.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, KRISTI NOEM, Secretary, U.S  
Department of Homeland Security, in her official  
capacity,

Respondents,

-----X  
MOTION FOR CHANGE OF VENUE

MOVANT: Miguel Vaamondes Barrios, Gloria Browning Vaamondes Barrios.  
RESPONDENT: U.S. DEPARTMENT OF HOMELAND SECURITY, KRISTI NOEM,  
Secretary, U.S. Department of Homeland Security, in her official capacity.

#### STATEMENT OF THE CASE

This matter is a civil action brought by Miguel Vaamondes Barrios, Gloria Browning Vaamondes Barrios. The current case is pending in the United States District Court for the Eastern District of New York.

#### STATEMENT OF REASON OF MOTION

Miguel Vaamondes Barrios, Gloria Browning Vaamondes Barrios moves this Court to transfer the case to the United States District Court for the Eastern District of Pennsylvania.

Gloria Browning Vaamondes Barrios believes this transfer is warranted for the following reasons:

1. Miguel Vaamondes Barrios was detained at ICE's Moshannon Valley Processing Center in Phillipsburg, PA since May 15, 2024. Miguel was later transferred after 9 months of being detained to El Paso Texas in February 2025, then to Lardeo, Texas in March 2025, where his "removal" to CECOT took place.
2. Miguel Vaamondes Barrios was never in ICE's custody in the Eastern District Court of New York.
3. Exhibit A: On February 28th 2025 , When contacting ICE to gain information on my husband's whereabouts, I , Gloria Browning Vaamondes Barrios, was informed by Ice officials to contact ICE's Philadelphia Field Office- Moshannon Sub Office. Miguel Vaamondes Barrios's deportation officer's name is Joshua Belcher (814) 895-0966 who works for the Philadelphia Field Office, Moshannon Sub Office Enforcement and Removal Operations. Mr. Belcher said " Ma'am, Yes I am his Deportation Officer handling his case. A 90 day review will be conducted and the paperwork will be submitted for review.

Under 28 U.S.C. § 1404(a), a district court may transfer a civil action to any other district where the action might have been brought. "[f]or the convenience of parties and witnesses in the interest of justice."

I, Gloria Browning Vaamondes Barrios, have established that the Eastern District of Pennsylvania is a proper venue, and that a transfer would be in the interest of justice and would better serve the convenience of parties and witnesses.

For the reasons stated above, Gloria Browning Vaamondes Barrios respectfully requests that this court grant the Motion for Change of Venue and transfer this case to the United States District Court for the Eastern District of Pennsylvania.

GLORIA BROWNING VAAMONDES BARRIOS

Digitally signed by Gloria Browning Vaamondes Barrios

Next Friend Of Miguel Vaamondes Barrios

Executed on this 29th Day of April 2025, Brooklyn New York

# EXHIBIT A

2:11

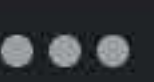


# 90 day custody review hearing- A-240176787



Belcher, Joshua A Feb 28

to me ▾



Ma'am,

Yes, I am his Deportation Officer handling his case. A 90 day review will be conducted and the paperwork will be submitted for review.

Respectfully,

—

*Josh Belcher*

Deportation Officer

Philadelphia Field Office, Moshannon Sub Office

Enforcement and Removal Operations

U.S. Immigration and Customs Enforcement

Cell: 814-895-0966

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